

Fill in this information to identify the case:

Debtor 1 Donna M. Brennan

Debtor 2
(Spouse, if filing)United States Bankruptcy Court for the: Middle District of PACase number 19-03433 MJC**Form 4100R** AMENDED**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: PNC BANK NATIONAL ASSOCIATION

Court claim no. (if known): 5

Last 4 digits of any number you use to identify the debtor's account: 7744

Property address:

160 Old Route 940
Pocono Lake, PA 18347**Part 2: Prepetition Default Payments**

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____**Part 3: Postpetition Mortgage Payment**

Check one:

☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 03 / 01 / 2025

☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) \$ _____

b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ _____

c. **Total.** Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x/s/ Denise Carlon
Denise Carlon
26 Mar 2025, 17:44:58, EDT

Date 03/26/2025

KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 16106
215-627-1322
bkggroup@kmlawgroup.com
Attorney for Creditor

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: Donna M. Brennan aka Donna
Maria Brennan**

Debtor(s)

**PNC BANK NATIONAL
ASSOCIATION**

Movant

vs.

**Donna M. Brennan aka Donna Maria
Brennan**

Debtor(s)

Jack N. Zaharopoulos,

Trustee

BK NO. 19-03433 MJC

Chapter 13

Related to Claim No. 5

CERTIFICATE OF SERVICE

AMENDED RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT

I, Denise Carlon of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on March 28, 2025, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)

Donna M. Brennan aka Donna Maria Brennan
160 Old Route 940
Pocono Lake, PA 18347

Attorney for Debtor(s) (via ECF)

Kim M. Diddio, Esq.
17 North 6th Street
Stroudsburg, PA 18360

Trustee (via ECF)

Jack N. Zaharopoulos
Standing Chapter 13 (Trustee)
8125 Adams Drive
Hummelstown, PA 17036

Method of Service: electronic means or first-class mail

Dated: March 28, 2025

/s/ Denise Carlon

Denise Carlon Esquire
Attorney I.D. 317226
KML Law Group, P.C.
BNY Mellon Independence Center
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Philadelphia, PA 19106
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